

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

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| SHANNON ASHFORD, |) | |
| |) | Civil Action No: <u>3:19-cv-00253-CMC-SVH</u> |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| PRICEWATERHOUSECOOPERS, LLP, |) | NOTICE OF REMOVAL |
| |) | |
| Defendant. |) | |
| |) | |

Defendant PricewaterhouseCoopers LLP (“Defendant”), in accordance with 28 U.S.C. §§ 1331 and 1446, petitions this Court for removal of this action currently pending in the Court of Common Pleas of Richland County, South Carolina designated as Civil Action No. 2018-CP-40-06545. In support, Defendant states as follows:

1. On or about December 14, 2018, Plaintiff filed a Summons and Complaint against Defendant in the Court of Common Pleas of Richland County, South Carolina.
2. On or about December 31, 2018, Plaintiff served Defendant with the Summons and Complaint.
3. This Notice of Removal has been timely filed within thirty (30) days after service of the Complaint. *See* 28 U.S.C. § 1446(b).
4. Venue is proper in this Court. This Court is in the judicial district and division embracing the place where the state court case was brought and is pending. Thus, it is the proper district court to which this case should be removed. *See* 28 U.S.C. §§ 1441(a) and 1446(a).
5. In the Complaint, Plaintiff alleges violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, *et seq.* and Section 1981, 42 U.S.C. §1981.

6. This action is removable pursuant to 28 U.S.C. § 1331, because Plaintiff's causes of action arise under the Constitution, treaties or laws of the United States.

7. In accordance with 28 U.S.C. § 1446(a), attached hereto as **Exhibit 1** are copies of all process, pleadings and orders served upon Defendant in this action and/or filed in the Court of the Common Pleas for Richland County, South Carolina, Civil Action No. 2018-CP-40-06545.

8. This Notice of Removal is being served upon counsel for Plaintiff and will be promptly filed with the Clerk of Court of the Court of Common Pleas for Richland County, South Carolina. *See* 28 U.S.C. § 1446(d).

WHEREFORE, Defendant respectfully requests that this case be properly removed, that the Court accept jurisdiction over the action and that this action be entered into the docket of this Court for further proceedings as if the action had originally been instituted in this court.

s/Stacy K. Wood
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Attorney for Defendant

January 29, 2019
 Charlotte, North Carolina

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

SHANNON ASHFORD,)
Plaintiff,) Civil Action No: 3:19-cv-00253-CMC-SVH
v.)
PRICEWATERHOUSECOOPERS, LLP,)
Defendant.)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **NOTICE OF REMOVAL** was electronically filed with the Clerk of Court using the CM/ECF system and served upon Plaintiff's counsel of record in this action on January 29, 2019, via electronic mail and First Class Mail, addressed as follows:

J. Charles Ormond, Jr.
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